

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re SHENGDATECH, INC. SECURITIES	:	Master No. 1:11-cv-01918-LGS
LITIGATION	:	
	:	<u>CLASS ACTION</u>
	:	
This Document Relates To:	:	NOTICE OF MOTION FOR PRELIMINARY
	:	APPROVAL OF PARTIAL CLASS ACTION
ALL ACTIONS.	:	SETTLEMENT
	:	
	:	
	X	

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiffs, Edward Schaul and Donald Yaw, will move the Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, 40 Foley Square, New York, NY 10007, at a date and at such time as may be designated by the Court, for an order granting preliminary approval of the proposed partial settlement of this putative securities class action, pursuant to Federal Rule of Civil Procedure 23(e), directing that notice be sent to all Class Members and summary notice to be published, and setting a hearing for final approval. This Motion is based on the Stipulation and Agreement of Settlement and the exhibits annexed thereto, and Lead Plaintiffs' Memorandum of Law in Support of Motion for Preliminary Approval of Settlement.

DATED: April 22, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 22, 2015.

s/ Samuel H. Rudman

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- (No manual recipients)